

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

The United States of America (“United States” or “Plaintiff”) and Victor Hugo Gutama, also known as Hugo Gutama (“Defendant”), (together, the “Parties”) stipulate and jointly move, pursuant to W.D. Wash. LCR 10(g), for entry of an order continuing to stay all proceedings and deadlines in this matter for an additional 60 days, until approximately September 3, 2018. In support of their request, the Parties state the following:

1. On February 5, 2018, Plaintiff filed a Complaint to Revoke Naturalization under 8 U.S.C. § 1451(a), seeking, *inter alia*, judgment revoking and setting aside Defendant's naturalization and cancelling his certificate of naturalization. Dkt. # 1.

1           2. On April 9, 2018, pursuant to the Parties' stipulated motion, the Court entered an  
2           Order staying all proceedings and deadlines in this matter. Dkt. # 10, 11. The stay  
3           was granted to provide the Parties with additional time to engage in discussions  
4           concerning whether this case might be resolved without further litigation and, if  
5           necessary, seek appropriate approval for any agreement. Dkt. # 10 at ¶ 4.

6           3. While the Parties have been trying to determine whether this case might be resolved  
7           without further litigation, they require additional time to work toward a potential  
8           resolution. Specifically, the Parties request that this matter be stayed for an additional  
9           60 days, at which time they propose to file a status report updating the Court of any  
10           developments and/or setting forth a proposal to govern further proceedings.

11           WHEREFORE, the Parties respectfully request that the Court grant their stipulated  
12           motion and continue to stay all proceedings and deadlines in this matter for an additional 60  
13           days, until approximately September 3, 2018, at which time the Parties propose to file a status  
14           report updating the Court of any developments and/or setting forth a proposal to govern  
15           proceedings.

16           Dated: July 5, 2018

17           Respectfully submitted,

18           /s/ Jay Gairson (by TMP w/ permission)  
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17 **Attorneys for the United States**

18 IT IS SO ORDERED.

19 DATED: July 9, 2018.

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25 Robert S. Lasnik  
26 United States District Judge